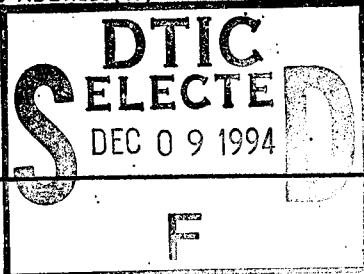


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13. ABSTRACT (Maximum 200 words) THE OBJECTIVES OF THE HAZARD ABATEMENT PLAN IS TO ELIMINATE THE PRESENCE OF NDMA WITHIN THE HYDRAZINE STORAGE AND BLENDING FACILITY AND SECONDLY TO ELIMINATE THE POTENTIAL EXPOSURE OF WORKERS TO HYDRAZINE AND UDMH DURING ANY HYDRAZINE OPERATION. TO ACCOMPLISH THIS OBJECTIVE A PHASE APPROACH WILL BE EMPLOYED TO MINIMIZE EMISSIONS. THE PLAN CONSISTS OF THE FOLLOWING FOUR PHASES: (1) FACILITY CLEAN-UP AND DECONTAMINATION, (2) FACILITY MODIFICATION-NDMA SOURCES, (3) FUEL SYSTEMS MODIFICATIONS, (4) DRUM FILLING AND CLEANING AND MISCELLANEOUS.				
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ROCKY MOUNTAIN ARSENAL
HYDRAZINE BLENDING & STORAGE FACILITY

HAZARD ABATEMENT PLAN

PREPARED BY

INDUSTRIAL DIVISION
DIRECTORATE TECHNICAL OPERATIONS
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19941202 068

ROCKY MOUNTAIN ARSENAL
HYDRAZINE BLENDING & STORAGE FACILITY

HAZARD ABATEMENT PLAN

1. PRESENT SITUATION:

a. Rocky Mountain Arsenal (RMA) operates the Hydrazine Storage and Blending Facility for the United States Air Force (USAF). Hydrazine operations consist of downloading/uploading of railroad cars and tanker trucks, storage and blending of rocket fuels. Bulk storage/blending involves hydrazine and Unsymmetrical Dimethylhydrazine (UDMH) and Aerozine 50 (Product Mix). This facility also fills drums from the bulk storage and stores other fuels such as Monomethyl Hydrazine (MMH), Monopropellant Hydrazine (MPH) and Hydrazine 70 (Hydrazine/Water mixture). The USAF utilizes the RMA facility as a depot to receive, store, blend and issue hydrazine fuels to various customers. RMA has operated the hydrazine facility under an Interservice Support Agreement (ISSA) since 1960.

b. During Jan, Feb, and Mar 1982, the Department of Labor (DOL)/Occupational Safety & Health Administration (OSHA) District Office conducted an inspection of the hydrazine facility. This inspection included sampling of the work area both during operational and non-operational periods for Hydrazine, UDMH, and N-Nitrosodimethylamine (NDMA). Background samples of other areas on the Arsenal were also taken. The OSHA sampling results are attached as Appendix A. Verbal guidance from OSHA indicating that safety upgrades were recommended for continued operation of the facility resulted in RMA stopping routine hydrazine operations. The USAF was formally advised of this situation on 5 May 1982. A meeting was held at RMA with the regional/district office of OSHA on 19 May 1982 at which time OSHA presented its findings and recommendations and participated with the USAF/USA representatives in discussion of possible corrective actions. OSHA inspection findings are attached as Appendix B. The USAF/USA indicated to OSHA that they shared OSHA concern for worker protection and that a plan of corrective actions would be prepared and submitted to OSHA.

2. HAZARD ASSESSMENT:

a. Review and analysis of the OSHA sampling report indicates the following:

1) During hydrazine transfer operations, the primary operation of the facility, personnel were not exposed to hydrazine or UDMH above the permissible personnel exposure limits. However during one specific activity, the operation of taking the physical inventory of the storage tanks, personnel were exposed to UDMH above the permissible personnel exposure limit. Prior to the OSHA inspection, RMA had recognized the necessity to incorporate engineering controls to eliminate the exposure and physical hazard of this operation. Specialized equipment had been purchased and is currently on hand awaiting installation. The following abatement plan does include the installation of the tank liquid level indicators as has been previously planned, which will eliminate this hazard.

2) During all operations sampled, personnel were exposed to NDMA (above the detectable limit). NDMA, also was detected at various locations within the facility, when sampled nine days after operations had been terminated. The source of NDMA could be due to the presence of UDMH (at non-detectable levels) or, as is more likely the situation, due to the presence of a sizeable open sump within the facility with waste water containing NDMA. NDMA is a regulated suspect carcinogen. OSHA representative's at the 19 May 1982 meeting, indicated that it was the opinion of the national OSHA office that the OSHA regulation for NDMA (29 Code of Federal Regulations (CFR) 1910.1016) applied to the situation at RMA. Based on this determination, OSHA officials presented 21 items of non-compliance (See Appendix B). RMA position has been that hydrazine blending and storage operations do not fall within the scope of this regulation, based upon the statement within the regulation that the regulation shall not apply to solid or liquid mixtures containing less than 1.0 percent by weight or volume of NDMA. Furthermore, as stated in the regulation, the regulation applies to any area in which NDMA is manufactured, processed, repackaged, released, handled or stored, which is not the situation at RMA, where the NDMA is formed in the atmosphere from oxidation of UDMH. Regardless of the legality of the regulation, RMA's position is to comply with the specific requirements insofar as it possible given the peculiar nature of an outdoor facility handling the spontaneously flammable hydrazine fuels. RMA recognizes that a serious situation does exist and the subject OSHA regulation on NDMA presents a viable guideline for the elimination of this hazard. Further discussion on the issue concerning the applicability of 29 CFR 1910.1016 is not at this time in the best interest of the concerned parties.

3. HAZARD ABATEMENT PLAN:

a. The objective of the hazard abatement plan is to eliminate the presence of NDMA within the hydrazine storage and blending facility and secondly to eliminate the potential exposure of workers to hydrazine and UDMH during any hydrazine operation. To accomplish this objective, a phased approach will be employed to minimize emissions. The plan consists of the following four phases:

1) PHASE I - FACILITY CLEAN-UP AND DECONTAMINATION.

The objective of this phase is to eliminate the presence of ambient NDMA within the facility by controlling the potential sources of NDMA. This will involve such tasks as draining, cleaning, and decontaminating of the waste water open sump and drain lines, and pressure testing (Nitrogen) and repair of the fuel piping. After this work has been completed, an industrial hygiene sampling study will be conducted by Army Environmental Hygiene Agency (AEHA) to certify that the work area is free of NDMA. Personnel will then be able to enter the hydrazine facility without the use of SCBA protection.

2) PHASE II - FACILITY MODIFICATION - NDMA SOURCES.

The primary objective of this phase is to modify process equipment that currently is a potential source of NDMA during fuel transfer operations. This will involve such tasks as: the disconnection of the vent scrubber in the blending station and scrubber piping modifications (vent and waste water) to permit the use of the scrubber in the east storage tank area; modification of the collection and storage of the hydrazine waste water system to provide a closed system and eliminate the use of the open sump; and relocation of the nitrogen supply tanks outside the regulated area. After completion of the above tasks, it is expected that fuel transfer and blending operations could be conducted without contamination of the facility by NDMA.

3) PHASE III - FUEL SYSTEMS MODIFICATIONS. The objective of this phase is to modify the fuel storage tanks to eliminate the exposure of workers to hydrazine and UDMH during inventory and sampling operations. This will involve the installation of electronic liquid level sensors with remote indicators and a closed sampling system. The installation of the above equipment will be accomplished on one tank at a time and will require the transfer of fuel between tanks. As stated above, it is not expected that transfer operations will result in the presence of NDMA. During this period, any USAF priority orders involving the bulk transfer and/or blending of fuel would be accommodated.

4) PHASE IV - DRUM FILLING AND CLEANING AND MISCELLANEOUS. The objective of this phase is to change the drum filling system and the drum cleaning operation to minimize the exposure of workers to hydrazine and UDMH during these operations. This will involve the installation of special equipment that will maintain a closed system during operations. Another task in this phase is the installation of a life support system (air supply) that would include an air supply source outside the regulated area with distribution lines to various stations within the facility. This system would be utilized by operations and maintenance workers during repair and emergency situations as required. During this phase the vent scrubber in the east storage tank area will be evaluated and if required, a new scrubber will be installed. During this phase the temporary personnel support facility installed under Phase I, may be replaced by more permanent facility.

4. PROTECTIVE MEASURES DURING ABATEMENT PERIOD. Appendix D provides specific procedures pertaining to protective clothing to be used during the abatement period. The procedures outlined should be adequate to address all OSHA concerns, and will lead to full compliance with 29 CFR 1910.1016. There are, however, two areas where it does not appear practicable or necessary to implement the very conservative measures required by the regulation. The areas are: (1) the use of full bodied impervious protective clothing for all entries into the hydrazine facility when NDMA is present; (2) the decontamination of all equipment and vehicles leaving the regulated area when NDMA (vapor) is present. RMA's position concerning these areas is as follows:

a. Use of Full Body Impervious Protective Clothing.

1) The major area of difference between OSHA interpretation of CFR 1910.1016 and what can or should be enforced occurs in the area of when to use a full body impervious protective garment. In its findings OSHA cited paragraph (c)(5)(i) and stated that a full suit was required for all facility entries. RMA took exception at the time of the finding's presentation and continues to do so for the following reasons:

a) Paragraph (c)(5)(i) deals with clean-up of leaks or spills, maintenance or repair operations on contaminated systems/equipment where direct contact with NDMA could result. In our plant this situation may well result from certain types of operations, however, OSHA's interpretation has been that airborne concentrations of NDMA constitute

continuous direct contact and that a full body impervious suit is therefore required for all entries irrespective of type of activity to be performed.

b) The assertion that percutaneous exposure from the very low levels of ambient NDMA constitutes a health hazard is most unlikely from a medical standpoint.

c) The use of M-3 Toxicological Agent Protective Suit can present an acute health and safety hazard due to heat or cold stress. Ref: DARCOM-R-385-102, Chapter 4-1 c.(7) "Maximum wearing time vs Ambient Temp." indicates that wearing time under extreme hot (such as above 90°F) weather is severely limited (15 minutes) and can actually be less than the donning, walk-in, walk-out and undressing time.

d) RMA is currently unequipped to handle or service air cooled suits.

e) Use of full suit protection would make activities necessary to eliminate the current NDMA emissions practically impossible and very hazardous since the use of heavy construction equipment is required during portions of the abatement effort.

2) We believe that a phased approach which ties levels of protective clothing to specific types of activities on the basis of exposure to known or possible NDMA sources is an acceptable approach which will allow the abatement plan to be accomplished with minimum risk of injury to our personnel. This phased approach is presented in Appendix D.

b. Decontamination of Equipment and Vehicles.

1) The major area of difference between the OSHA interpretation and the RMA position is the OSHA requirement (paragraph (d)(4)(iii)) to establish and implement decontamination procedures to remove (suspect) NDMA from surfaces of materials and equipment before leaving the regulated area even when the equipment has only been subjected to extremely low airborne concentrations of NDMA. RMA and the USAF voiced exception to this requirement when OSHA presented its finding's/recommendations and still do for the following reasons:

a) At the very low concentration levels of NDMA found in the hydrazine facility (see Appendix A), calculations indicate that NDMA will not condense out of the atmosphere

at ambient conditions, and so will not contaminate materials and equipment, as suggested by OSHA.

b) Wipe samples of materials and equipment within the hydrazine facility that were/are subjected to airborne concentration of NDMA indicated non-detectable NDMA and UDMH. These results substantiate the theoretical assessment in the above paragraph.

2) RMA recognizes the fact that equipment could become contaminated by direct contact with liquid fuels and/or waste water containing NDMA or UDMH. Decontamination procedures will be established and implemented for use when known or potential contamination of materials/equipment with liquids containing NDMA or hydrazines has occurred.

5. MONITORING PLAN - RMA proposes to implement the following monitoring plan consistent with the plant decontamination, engineering controls, modifications and operations.

a. Phase I - Environmental Monitoring after Facility Clean-up and Decontamination. Upon completion of tasks outlined in Appendix C - Phase I - Facility Clean-up & Decontamination, an industrial hygiene air sampling study will be conducted by AEHA to certify that NDMA is no longer present in the hydrazine facility.

b. Phase II - Environmental and Personnel Monitoring after Engineering Modifications. Appendix C, Phase II - Facility Modifications - NDMA Sources delineates the tasks to be accomplished to eliminate NDMA sources. After completion of Phase II, during Phase III which will involve limited fuel transfer operations, a second industrial hygiene study will be conducted by AEHA to determine the presence of hydrazines and NDMA both during and after fuel transfer operations.

c. Phase III - Environmental Monitoring During Operations. An environmental monitoring system will be installed capable of monitoring hydrazines at multiple sample locations. Monitoring will be performed prior to entry to the facility and during all operations. RMA will have an in-house capability to support this monitoring program to include laboratory chemical analysis. During operations, NDMA will not be monitored, as it is expected Phase II monitoring test results will substantiate that after facility modifications have been completed eliminating NDMA sources, monitoring only for hydrazines will be required. (i.e. if hydrazines are not present than NDMA cannot be present.)

6. MEDICAL SURVEILLANCE PROGRAM DURING ABATEMENT PERIOD. During the period of clean-up (Phase I), while the possibility of contamination by and exposure of NDMA exists, special medical surveillance of the workers will be in effect. This will consist of approximately weekly contact with medical personnel, who will check for any evidence of illness, document the medical record, and get monthly urinalysis and liver function studies, and perform any other medical investigation studies that may be indicated.

7. RESPONSES TO OSHA FINDINGS. Appendix E indicates specific actions to be taken that will eliminate any health hazard posed by presence of NDMA in the hydrazine facility and also addresses the OSHA findings.

APPENDIX A
SAMPLING RESULTS AT ROCKY MOUNTAIN ARSENAL

DATE	SAMPLE ID	TYPE	OPERATION	LOCATION OF SAMPLER	LENGTH OF SAMPLER (MIN)	CONTAMINANT	EXPOSURE	Hydrazine	Hydrazine
								ppm's	ppm's
01/28/82	RMA 1 & 3	Area	Transfer from Storage Tank to Truck Tanker	In Office	50	Dimethyl Aniline	N.D.	1.3mg/m ³	1.0mg/m ³
	RMA 2 & 4	Area		Sump (North side)	50	"	N.D.		
	RMA 8	Personal		Pete Hollendor	200	Hydrazine	N.D.		
	RMA 14	Personal		"	UDHII				0.017mg/m ³
	RMA 9	Personal		"	73	Hydrazine	N.D.		
	RMA 15	Personal		Rudy Martinez	200	Hydrazine	N.D.		
	RMA 10	Personal		"	UDHII				
	RMA 16	Personal		Abe Padilla	48	Hydrazine	N.D.		
	RMA 11	Area		"	UDHII				
	RMA 17	Area		"	71	Hydrazine	N.D.		
	RMA 12	Area		Office	210	Hydrazine	N.D.		
	RMA 18	Area		"	UDHII				
	RMA 19	Area		"	51	Hydrazine	N.D.		
	RMA 20	Personal		Sump (north side)	200	Hydrazine	N.D.		
	RMA 21	Personal		"	UDHII				
	RMA 22	Personal		"	43	Hydrazine	N.D.		
	RMA 23	Area		Support Beam Near Office	200	Hydrazine	N.D.		
	RMA 24	Area		"	UDHII				
	RMA 25	Area		"	41	Hydrazine	N.D.		
				Pete Hollendor	273	Hydrazine	39.0ug/m ³	22.2ug/m ³	
				Rudy Martinez	267	Hydrazine	9.6ug/m ³	5.3ug/m ³	
				Abe Padilla	279	Hydrazine	9.3ug/m ³	9.3ug/m ³	
				Office	252	Hydrazine	10.0ug/m ³	5.25ug/m ³	
				Sump (north side)	242	Hydrazine	6.1ug/m ³	2.1ug/m ³	
				Support Beam Near Office	240	Hydrazine	1.5ug/m ³	1.75ug/m ³	

APPENDIX A
SAMPLING RESULTS AT ROCKY MOUNTAIN ARSENAL.

DATE	SAMPLE ID	TYPE	OPERATION	LOCATION OF SAMPLER	LENGTH OF SAMPLER(MIN)	CONTAMINANT	EXPOSURE
02/16/82	RMA 30	Personal	Inventory	Pete Hollendor	63	NDMA	61.0 ug/m ³
	RMA 32	Personal		Abe Padilla	55	NDMA	8.0 ug/m ³
	RMA 31	Personal		Pete Hollendor	63	Hydrazine	1.7 ug/m ³
	RMA 33	Personal		Abe Padilla	55	UDMA	0.42 mg/m ³
							0.8 mg/m ³
							1.3 ug/m ³
							1.01 ug/m ³
							4.1 ug/m ³
02/25/82	RMA 40	Area	Background Levels	N.W. Corner Tank Farm	276	NDMA	0.58 ug/m ³
	RMA 41	Area		Office	274	NDMA	0.33 ug/m ³
	RMA 42	Area		Sump (N.E. corner)	274	NDMA	2.7 ug/m ³
	RMA 43	Area		Sump (S.W. corner)	274	NDMA	1.56 ug/m ³
	RMA 44	Area		North Out Building	274	NDMA	2.7 ug/m ³
	RMA 45	Area		Truck Loading Bay	270	NDMA	1.8 ug/m ³
	RMA 46	Area		Rail Car Loading Bay	269	NDMA	< 0.37 ug/m ³
	RMA 47	Arch		Control Station	268	NDMA	2.6 ug/m ³
	RMA 48	Area		Drum Storage	267	NDMA	1.5 ug/m ³
	RMA 49	Area		Tank Farm Between	266	NDMA	2.6 ug/m ³
	RMA 50	Area		NAS & CS 1	265	NDMA	0.43 ug/m ³
	RMA 51	Area		S.E. Corner Tank Farm	263	NDMA	0.26 ug/m ³
				Outer Gate (North)	262	NDMA	2.3 ug/m ³
							1.3 ug/m ³
							0.53 ug/m ³
03/10/82	RMA 55	Area	Background Levels	North Side Building 111	252	NDMA	< 0.38 ug/m ³
	RMA 56	Area	at other parts of	N.E. side Basin "F"	198	NDMA	N.D.
	RMA 58	Area	the Arsenal	South side Building 831	193	NDMA	N.D.
	RMA 60	Area		E. side Building 1710	191	NDMA	N.D.
	RMA 62	Area		(Clinic)		NDMA	N.D.
	RMA 64	Area		S. of Building 538	172	NDMA	N.D.
				Building 314 to Lunch	171	NDMA	N.D.
	RMA 57	Area		Room		Hydrazine	N.D.
						Whill	N.D.

APPENDIX A
SAMPLING RESULTS AT ROCKY MOUNTAIN ARSENAL.

DATE	SAMPLE ID	TYPE	OPERATION	LOCATION OF SAMPLER	LENGTH OF SAMPLER(MIN)	CONTAMINANT	EXPOSURE	TWA
03/10/82	RMA 59	Area	Background levels at other Parts of Arsenal	South side Building 831	193	Hydrazine UHII	H.D. N.D.	
	RMA 61	Area		E. side Building 1710 (Clinic)	190	Hydrazine UHII	N.D.	
	RMA 63	Area		South of Building 538	172	Hydrazine UHII	H.D.	
	RMA 65			Building 314 in Lunchroom	170	Hydrazine UHII	H.D.	
	RMA 69	Area	Draining Sump	On retaining wall of storage tank east of hydrazine facility	60	NMPA	H.D.	
	RMA 70	Personal		Rudy Martinez	224	NMPA	< 4.5 ug/m ³	
	RMA 72	Personal		Abe Padilla	220	NMPA	0.64 ug/m ³	0.2 ug/m ³
	RMA 68	Area		On retaining wall of Storage Tank east of hydrazine facility	60	Hydrazine UHII	N.D. N.D.	
	RMA 71	Personal		Rudy Martinez	185	Hydrazine UHII	H.D.	
	RMA 73	Personal		Abe Padilla	183	Hydrazine UHII	H.D. N.D.	
03/17/82	RMA 83	Personal	Transfer UHII from rail car to storage tank.	Abe Padilla	193	Hydrazine UHII	H.D. H.D.	
	RMA 84	Personal		" "	145	Hydrazine UHII	H.D. H.D.	
	RMA 85	Personal		" "	338	NMPA		
	RMA 86	Personal		Rudy Martinez	194	Hydrazine UHII	1.9 ug/m ³	1.3 ug/m ³
	RMA 87	Personal		Rudy Martinez	144	Hydrazine UHII	H.D.	
	RMA 88	Personal		Rudy Martinez	338	NMPA		
	RMA 89	Personal		Harvey Lynch	199	Hydrazine UHII	1.6 ug/m ³	0.9 ug/m ³
	RMA 90	Personal		" "	137	Hydrazine UHII	H.D. H.D.	

APPENDIX A
SAMPLING RESULTS AT ROCKY MOUNTAIN ARSENAL.

DATE	SAMPLE ID	TYPE	OPERATION	LOCATION OF SAMPLER	LEGEND OF SAMPLER (MIN)	CONTAMINANT	EXPOSURE TYA	TYA
							1.5 ug/m ³	1.05 ug/m ³
03/17/82	RMA 91	Personal	Transfer UDIII from tall car to storage tank.	Harvey Lynch Near Scrubber Vent	183	Hydrazine UDIII	N.D.	N.D.
	RMA 92	Area		" " "	120	Hydrazine UDIII	N.D.	N.D.
	RMA 94	Area		" " "	186	NDMA	1.3 ug/m ³	1.81 ug/m ³
	RMA 95	Area		" " "	118	NDMA	5.3 ug/m ³	1.81 ug/m ³
	RMA 96	Area		" " "	235	Hydrazine UDIII	N.D.	N.D.
	RMA 98	Area		In Office	66	Hydrazine UDIII	N.D.	N.D.
	RMA 99	Area		In Office	303	NDMA	1.1 ug/m ³	6.9 ug/m ³
	RMA 100	Area		" " "	230	Hydrazine UDIII	16.0 ug/m ³	9.9 ug/m ³
	RMA 102	Area		" " "	67	Hydrazine UDIII	56.0 ug/m ³	43.01 ug/m ³
	RMA 103	Area		" " "	298	NDMA	116.0 ug/m ³	30.0 ug/m ³
	RMA 104	Area		" " "			18.63 ug/m ³	
03/15/82	RMA 78	Area	Draining Sump	In Office near Drain North Out Building on Refrigerator	240	NDMA	3.5 ug/m ³	1.25 ug/m ³
	RMA 79	Area		" " "	260	NDMA	< .42 ug/m ³	
	RMA 81	Bulk		Sump Water		NDMA	< 180.0 ug/m ³	
	RMA 82	Bulk		Sump Water		Hydrazine UDIII		
03/17/82	RMA 92	Area	Transfer of rail car of UDIII	Scrubber Near Vent Pipe (Bubble)	300	NDMA	1.8 ug/m ³	1.13 ug/m ³
	RMA 97	Area		Office (Bubble)	298	NDMA	.27 ug/m ³	.17 ug/m ³
	RMA 101	Area		Control Panel (Bubble)	294	NDMA	16.9 ug/m ³	10.35 ug/m ³
	RMA 105	Area		Tank Farm, east side of US 1	293	NDMA	.16 ug/m ³	.095 ug/m ³
	RMA 106	Area		On Top Tank CS 1	228	Hydrazine UDIII	N.D.	N.D.

APPENDIX A
SAMPLING RESULTS AT ROCKY MOUNTAIN ARSENAL

DATE	SAMPLE ID	TYPE	OPERATION	LOCATION OF SAMPLER	LENGTH OF SAMPLER(MIN)	CONTAMINANT	EXPOSURE TIME
01/17/82	RMA 107	Area	Transfer UDHL from rail car to storage tank	On top tank CS 1	66	Hydrazine UDHL	N.D.
	RMA 108	Area	" " " "	" " " "	294	NDMA	N.D.
	RMA 112	Wipe	Abe Padilla's Apron	N/A	NDMA	Hydrazine UDHL	N.D.
	RMA 113	Wipe	Rudy Martinez' Apron	N/A	NDMA	Hydrazine UDHL	N.D.
	RMA 114	Wipe	Dip sticks used to gauge tanks	N/A	NDMA	Hydrazine UDHL	$\leq 7 \text{ ug/m}^3$
	RMA 115	Wipe	Desk In Office	N/A	NDMA	Hydrazine UDHL	N.D.

APPENDIX B
OSHA INSPECTION FINDINGS

1
29 CFR 1910.134(b)(6): Respirators were not stored in a convenient, clean and sanitary location:

(a) In the hydrazine facility, self-contained breathing apparatus used for routine operations were stored in the office which was contaminated with N-Nitrosodimethylamine.

2a
29 CFR 1910.1000(a)(2): Employee(s) were exposed to material(s) in excess of the 8-hour time weighted average limit(s) listed for the particular material(s) in Table Z-1 of subpart Z of 29 CFR part 1910:

(a) In the hydrazine facility, the two chemical plant operators engaged in an inventory operation of the above ground storage tanks were exposed to levels of 1,1 dimethylhydrazine in excess of those listed in Table Z-1 as follows:

Operator #1 - 1.3 mg/m³, 1.3 times the standard.

Operator #2 - 4.14 mg/m³, 4.14 times the standard.

2b
29 CFR 1910.1000(e): Feasible administrative or engineering controls were not determined and implemented to reduce employee exposure(s):

(a) In the hydrazine facility, the two chemical plant operators were overexposed to 1,1 dimethylhydrazine and feasible engineering controls were not implemented. See exposures in Item 2a, above.

The following items, 3 through 21, are work practice controls required when exposed to NDMA. The recommended exposure limit is the detection limit, 0.01 ug per sample. The results of sampling at Rocky Mountain Arsenal showed personal exposures ranging from about 1.4 ug/m³ to 61 ug/m³, which is 140 to 6100 times the detection limit.

3

29 CFR 1910.1010(c)(2)(ii): Employees were not required to wash hands, forearms, face, and neck upon each exit from the regulated area, close to the point of exit and before engaging in other activities:

(a) In the hydrazine facility, employees were not required to wash near the point of exit of the regulated area upon each exit.

4

29 CFR 1910.1010(c)(3): Open vessel system operations as defined in paragraph (b)(10) were not prohibited:

(a) In the hydrazine facility, the waste water sump, an open vessel operation, was not prohibited.

5

29 CFR 1910.1010(c)(4)(iii): Employees were not provided with clean, full body protective clothing, shoe covers, and gloves prior to entering the regulated area:

(a) In the hydrazine facility, employees were not provided with shoe covers and gloves prior to entering the regulated area.

6

29 CFR 1910.1010(c)(4)(v): Prior to each exit from a regulated area, employees were not required to remove and leave protective clothing and equipment at the point of exit and at the last exit of the day, to place used clothing and equipment in impervious containers at the point of exit for purposes of decontamination or disposal:

(a) In the hydrazine facility, employees did not remove and leave protective coveralls at the point of exit, and also, at the last exit of the day the coveralls were not placed in impervious containers at the point of exit for decontamination or disposal.

7

29 CFR 1910.1010(c)(4)(viii): Drinking fountains were not prohibited in the regulated area:

(a) On the West side of the hydrazine facility in the North out-building, a drinking fountain was in operation.

10 29 CFR 1910.1016(c)(5)(i): In clean-up of leaks or spills, maintenance or repair operations on contaminated systems or equipment, where direct contact with N-Nitrosodimethylamine could result, each authorized employee entering that area was not provided with and required to wear clean, impervious garments, including gloves, boots and continuous-air supplied hood in accordance with 1910.134:

(a) In the hydrazine facility, employees engaged in routine maintenance were not required to wear impervious garments and continuous air supplied hood. At times these employees wore H-9 gas masks or no respiratory protection at all. Also, the protective clothing at times was a pair of coveralls.

11 29 CFR 1910.1016(c)(5)(ii): In clean-up of leaks or spills, maintenance or repair operations on contaminated systems or equipment, where direct contact with N-Nitrosodimethylamine could result, each authorized employee entering that area was not decontaminated before removing the protective garments and hood:

(a) In the hydrazine facility, employees engaged in routine maintenance operations were not decontaminated before removing protective garments.

12 29 CFR 1910.1016.(c)(5)(iii): In clean-up of leaks or spills, maintenance or repair operations on contaminated systems or equipment, where direct contact with N-Nitrosodimethylamine could result, each authorized employee entering that area was not required to shower upon removing the protective garments and hood:

(a) In the hydrazine facility, employees engaged in routine maintenance operations were not required to shower upon removing the protective garments.

13 29 CFR 1910.1016(d)(2)(i): In an emergency, immediate measures including, but not limited to, the requirements of subdivisions (i), (ii), (iii), (iv), and (v) of this paragraph were not implemented:

(i) The potentially affected area was not evacuated as soon as the emergency had been determined.

(ii) Hazardous conditions created by the emergency were not eliminated and the potentially affected area was not decontaminated prior to resumption of normal operations.

(iii) Special medical surveillance by a physician was not instituted within 24 hours for employees present in the potentially affected area at the time of the emergency. A report of the medical surveillance and any treatment shall be included in the incident report, in accordance with paragraph (f)(2) of this section.

(iv) Where an employee has a known contact with N-Nitrosodimethylamine, such employee was not required to shower as soon as possible, unless contraindicated by physical injuries.

(v) An incident report on the emergency was not reported as provided in paragraph (f)(2) of this section.

(a) In the hydrazine facility, emergency procedures had not been established and implemented.

NOTE: Based on the definition of "emergency" in 1910.1016(b)(3) i.e., "circumstance or set of circumstances resulting in the release of N-Nitrosodimethylamine which may result in exposure to or contact with N-Nitrosodimethylamine", the normal operation of this hydrazine facility can be defined as an emergency situation because NDMA is constantly present.

12

29 CFR 1910.1016(d)(3)(i): Storage or consumption of food, storage or use of containers of beverages, storage or application of cosmetics, smoking, storage of smoking materials, tobacco products or other products for chewing, or the chewing of such products, were not prohibited in the regulated area:

(a) On the West side of the hydrazine facility, in the north out-building several cases of Gatorade were being stored.

13

29 CFR 1910.1016(d)(3)(ii): Where employees are required by this section to wash, washing facilities were not provided in accordance with 1910.141(d)(1) and (2)(ii) through (vii):

(a) In the hydrazine facility, washing facilities were not provided.

14

29 CFR 1910.1016(d)(3)(iii): Where employees are required by this section to shower, shower facilities were not provided in accordance with 1910.141(d)(3):

(a) In the hydrazine facility, shower facilities were not provided.

15

29 CFR 1910.1016(d)(3)(iv): Where employees wear protective clothing and equipment clean change rooms were not provided, in accordance with 1910.151(e), for the number of such employees required to change clothes:

(a) In the hydrazine facility, clean change rooms were not provided.

16

29 CFR 1910.1016(d)(4)(ii): Any equipment, material, or other item taken into or removed from a regulated area was not done so in a manner that does not cause contamination in nonregulated areas or the external environment:

(a) In the hydrazine facility, motor vehicles and SCBA tanks were removed from the regulated area without being decontaminated.

17

29 CFR 1910.1016(d)(4)(iii): Decontamination procedures were not established and implemented to remove N-Nitrosodimethylamine from the surfaces of materials, equipment, and the decontamination facility:

(a) In the hydrazine facility, decontamination procedures had not been established or implemented.

18

29 CFR 1910.1016(e)(1)(ii): Entrances to regulated areas containing operations covered in paragraph (c)(5) of this section were not posted with signs bearing the legend:

CANCER SUSPECT AGENT
EXPOSED IN THIS AREA
IMPERVIOUS SUIT INCLUDING
GLOVES, BOOTS, AND AIR-
SUPPLIED HOOD REQUIRED
AT ALL TIMES
AUTHORIZED PERSONNEL ONLY

(a) In the hydrazine facility, the above noted warning

17

20 CFR 1910.1016(e)(1)(iii): Appropriate signs and instructions were not posted at the entrance to, and exit from, regulated areas, informing employees of the procedures that must be followed in entering and leaving a regulated area:

(a) In the hydrazine facility, signs and instructions were not posted.

20

20 CFR 1910.1016(e)(5)(i): Each employee prior to being authorized to enter a regulated area, did not receive a training and indoctrination program including, but not necessarily limited to:

(a) The nature of the carcinogenic hazards of N-Nitrosodimethylamine, including local and systemic toxicity;

(b) The specific nature of the operation involving N-Nitrosodimethylamine which could result in exposure;

(c) The purpose for the application of the medical surveillance program, including, as appropriate, methods of self-examination;

(d) The purpose for and application of decontamination practices and purposes;

(e) The purpose for and significance of emergency practices and procedures;

(f) The employee's specific role in emergency procedures;

(g) Specific information to aid the employee in recognition and evaluation of conditions and situations which may result in the release of N-Nitrosodimethylamine;

(h) The purpose for and application of specific first aid procedures and practices.

(1) In the hydrazine facility, a training and indoctrination program had not been established and implemented.

21

20 CFR 1910.1016(e)(5)(ii): Specific emergency procedures were not prescribed and posted:

(a) In the hydrazine facility, emergency procedures had not been established.

APPENDIX C
HAZARD ABATEMENT PLAN

1. Phase I - Facility Clean-up and Decontamination.

<u>TASK</u>	<u>DESCRIPTION/COMMENT</u>
a. Drain Sump.	Waste water containing NDMA in open sump within facility will be pumped to storage tanks in east area. Pump controls are remote operated.
b. Install personnel support facility.	Special modified trailer designed for use as personnel change facility in support of lethal chemical agent operations will be installed at hydrazine facility.
c. Provide Protective Equipment.	Procure air supplied respirators with umbilical adapter and set up mobile air supply system within facility.
d. Decontaminate Sump/Drains.	Sump and drain lines will be cleaned and decontaminated. Waste will be pumped to east storage tanks.
e. Fuel System Test.	Pressure testing (Nitrogen) of fuel piping will be conducted. Minor repairs will be done.
f. Industrial Hygiene Sampling.	An industrial hygiene air sampling study will be conducted by AEHA to certify that NDMA is no longer present in the hydrazine facility. Survey will also include sampling for the presence of hydrazine and UDMH.

2. Phase II - Facility Modification - NDMA Sources.

- a. Modify Scrubber System Present vent scrubber is located within blender control area and waste water containing NDMA flows (openly) into drain line. This scrubber will be disconnected from hydrazine vent piping, thus eliminating source of NDMA within that part of the facility. The scrubber located in the east storage tank area will be connected to the vent system and the waste

<u>TASK</u>	<u>DESCRIPTION/COMMENT</u>
	water will be collected and pumped to the east storage tanks.
b. Modify Waste Water System.	The existing waste water system is an open system. Modifications would include the elimination of the sump, modification of the drains, and a new undergournd waste water pipe to the east storage tanks.
c. Relocate Nitrogen Supply.	Existing nitrogen supply is within regulated area. This task is to relocate supply tanks outside regulated area.
<u>5. Phase III - Fuel System Modifications.</u>	
a. Install Liquid Level System.	This task involves the placement of electronic liquid level sensors within each of six bulk storage tanks and the installation of electrical wiring/ controls to a remote indicator panel within Bldg 759.
b. Modify Fuel Sampling System.	Present method of fuel sampling is open system. Task involves the installation of closed sampling devices at various locations in the fuel piping system.
c. Fuel System Leak Test.	The installation of a liquid level sensors require the storage tank to be empty of fuels. During fuel transfer operation to accommodate this task, the fuel lines will be checked using a hydrazine/UDMH leak detector.
d. Industrial Hygiene Sampling Study.	A second industrial hygiene sampling study will be conducted by AEHA, to certify that NDMA is not present within the work area after fuel transfer operations have been performed.

4. Phase IV - Drum Filling and Cleaning and Misc.

<u>TASK</u>	<u>DESCRIPTION/COMMENT</u>
a. Drum Filling Modifications.	The existing drum filling station allows fuel leaks to occur during making and breaking of connections. This modification would eliminate this hazard by providing an enclosed system.
b. Install Drum Cleaning Equipment.	The existing system of cleaning drums allows fuel vapors to escape when connecting cleaning lines to the drum. The installation of new enclosed drum cleaning equipment would eliminate this hazard.
c. Install Life Support System.	This task would involve the installation of a air supply system located outside the regulated area with distribution lines to multiple fixed stations within the facility, thus permitting personnel to work for extended periods using SCBA.
d. Install new Scrubber East Area.	During Phase I, the existing scrubber located in the east storage tank area will be connected to the fuel vent system. Engineering tests will be conducted, with results to determine whether a new scrubber will be required.
e. Construct Personnel Support Facility.	Approval for construction of permanent personnel support facility is dependent on long term requirement for continued use of hydrazine facility which is presently under study by USAF.

APPENDIX D

1. General. This appendix deals with the following areas of concern:

- a) Types of Operations.
- b) Protective Clothing to be used during the abatement period.
- c) Dress and undress procedures for each level of protection.

All areas of concern will be incorporated into the appropriate standing operating procedure prior to implementation.

2. Types of Operations. For purposes of clarifying the occasion for use of various levels of Protective Clothing the types of operations which will be performed during the abatement period can be classified into four types:

- Type 1: Routine entry for inspection, data gathering and other administrative purposes which require no contact with liquids containing NDMA or operation of equipment.
- Type 2: Entry to conduct abatement or routine operations on equipment where the possibility of exposure to NDMA bearing liquid or UDMH has been practically eliminated.
- Type 3: Conduct of abatement or routine operations where the possibility of exposure to NDMA bearing liquid or UDMH exists only under unforeseen circumstances.
- Type 4: Conduct of abatement or routine maintenance and repair, conduct of decontamination operations, where exposure to NDMA bearing liquid or UDMH is probable or certain.

3. Protective Clothing.

a. Definition of Levels: The protective clothing to be employed consists of four levels which roughly correspond to those levels used for lethal chemical agent operations. The primary difference being the type of respiratory protection required. The following comprise the definitions and content of the various protective clothing levels:

1) Level A (Modified):

Inner Clothing:

- a) Undershirt, unimpregnated
- b) Drawers, unimpregnated
- c) Socks, unimpregnated

Liner: Coveralls, disposable, tyvek material.

Outer Clothing: Suit - Coverall, Toxicological Agent Protective (TAP) M3.

Gloves: Butyl (TAP) M4

Footwear: Boots, butyl, safety toe, TAP, M2A1

Headgear: Hood, butyl rubber, MSA (for SCBA)

Respirator: SCBA, Mine Safety Appliances or Scott

2) Level B (Modified):

Inner Clothing:

- a) Drawers, unimpregnated
- b) Undershirt, unimpregnated
- c) Socks, unimpregnated

Outer Clothing: Apron, TAP, M2

Gloves: Butyl, TAP, M4

Footwear: Boots, butyl, safety toe, TAP, M2A1

Headgear: Hood, butyl rubber, MSA (for SCBA)

Respirator: SCBA, Mine Safety Appliances or Scott

3) Level D (Modified):

Inner Clothing:

- a) Drawers, unimpregnated
- b) Undershirt, unimpregnated
- c) Socks, unimpregnated

Outer Clothing: Coveralls, disposable, tyvek material

Gloves: Surgical, disposable

Footwear: Boots, butyl, steel toed, TAP, M2A1

Headgear: None

Respirator: SCBA, MSA or Scott

4) Level D (Standard):

Inner Clothing:

- a) Drawers, unimpregnated
- b) Undershirt, unimpregnated
- c) Socks, unimpregnated

Outer Clothing: Coveralls, explosive handlers, cotton

Gloves: None

Footwear: Shoes, safety toe

Headgear: None

Respirator: M9 protective mask, slung

b. Protective Clothing requirements by Phase and Type of Operation. The following represent the levels of protective clothing to be employed during the four phases of the abatement period, correlated to the type of operation expected to occur.

Phase I - Facility Clean-up and Decontamination.

<u>Examples of Types of Operation</u>	<u>Protective Clothing Level</u>
Type 1: Routine Safety Inspection, data collection on nitrogen tank and sump pit levels; check of sprinkler system and heat trace system; non-product equipment maintenance.	Modified Level D
Type 2: Draining of Sump via remote pump controls, etc.	Modified Level D

<u>Examples of Types of Operation</u>	<u>Protective Clothing Level</u>
Type 3: External equipment wash-down, application of decontaminant to sump if done remotely, etc.	Modified Level B
Type 4: Disassembly of equipment containing UDMH Vapors or wastewater, etc.	Modified Level A

Phase II - Facility Modifications - NDMA Sources

<u>Examples of Types of Operation</u>	<u>Protective Clothing Level</u>
Type 1: Routine Inspections as above, Operation of Construction Equipment or process equipment not containing UDMH or wastewater; non product equipment maintanance.	Standard Level D
Type 2: Installation or Maintenance operations on equipment where NDMA contact has been practically eliminated.	Modified Level D
Type 3: External equipment wash-down, application of decontaminant to sump if done remotely, etc.	Modified Level B
Type 4: Disassembly of equipment containing UDMH vapors or wastewater, etc.	Modified Level A

Phase III - Storage Tank Modifications and Limited Bulk Operations.

<u>Examples of Types of Operation</u>	<u>Protective Clothing Level</u>
Type 1: As in Phase I, after re-initiation of Bulk operations but prior to certification by monitoring of NDMA absence.	Modified Level D
Type 2: As above, also certain maintenance activities on non-product equipment	Modified Level D

<u>Examples of Types of Operations</u>	<u>Protective Clothing Level</u>
Type 3: Operation of Fuels Process Equipment to accomplish blending, transfer, etc; Certain aspects of Product Equipment Maintenance	Modified Level B
Type 4: Maintenance requiring opening UDMH product lines or contaminated wastewater lines.	Modified Level A

Phase IV - Modification for Drum Type Operations

<u>Examples of Types of Operations</u>	<u>Protective Clothing Level</u>
Type 1: As in Phase III above unless facility has been moni- tored clean prior to Phase IV initiation.	Modified Level D (Level D Standard, if monitored clean)
Type 2: As above, includes cer- tain phases of drum equipment installation.	Modified Level D
Type 3: As above, includes certain phases of drum equip- ment or scrubber system in- stallation.	Modified Level B
Type 4: Installation or Main- tenance requiring opening of UDMH Product or contaminated wastewater lines.	Modified Level A

4. Dress and Undress Procedures.

a. Specific instructions to accommodate provisions of 1016 regulation will be incorporated into Standing Operating Procedures. The procedures for various levels of dress will comply with the following regulatory sections:

<u>Level of Protection</u>	<u>Regulatory Citation Summary of Requirement</u>
Standard Level D	Para (c)(2)(ii) / Wash Hands, forearms, face and neck upon each exit.

<u>Level of Protection</u>	<u>Regulatory Citation Summary of Requirement</u>
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Modified Level D	Para (c)(4)(v)-(vii) / At point of exit remove and leave protective clothing, or last exit place clothing in containers for decon/ disposal. Wash hands, fore- arms, face and neck on each exit: Shower after last exit of day.
Modified Level B	None / Wash gloves and boots before removing protective garments, wash hands, fore- arms, face and neck on each exit; shower after last exit of day.
Modified Level A	Para (c)(5)(ii)-(iii) / Decon- taminate before removing protective garments; shower at each exit.

b. Procedures involving disposal or decontamination and laundering of protective garments will be incorporated in the above mentioned SOP's.

APPENDIX E
RESPONSE TO OSHA FINDINGS

1. General. This appendix delineates the specific actions that RMA will take in response to the OSHA findings. These actions will be taken as required to support the phased abatement plan outlined in Appendix C. When implemented, the health risk posed by the NDMA vapors now present in the hydrazine facility will be greatly reduced and future hydrazine operations should be in compliance with 29 CFR 1910.1016. In many cases a single response satisfies more than one OSHA finding and the finding are so grouped.

2. Specific Responses.

a. OSHA findings No. 1, 5, 6, 12, 13, 14 and 15. Prior to decontamination and clean-up work within the hydrazine plant, a personnel support facility will be provided near the entrance to the regulated area.

In order to initiate Phase I activities as soon as possible, RMA intends to install a special modified trailer as the personnel support facility. This trailer was designed to meet personnel support requirements for lethal chemical operations which are similar in nature. The personnel support facility will provide a clean and sanitary location for storage of protective equipment and clothing, a clean change area, a wash and shower room, and a clean administrative area. SOP's will be prepared describing the use of this facility; to include such activities as; change out and proper storage of protective and work clothing, wash and shower requirements, and restrictions on smoking, eating and drinking within both the regulated area and support facility.

b. OSHA findings No. 2a and 2b. Phase III - Storage tank modifications will include the installation of liquid level sensors, with remote indicators, on all storage tanks. Physical inventory operations on the storage tanks with the potential to expose workers will no longer be performed.

c. OSHA finding No. 4. As part of Phase I (Facility clean-up and decontamination) activities, the contents of the waste water sump will be pumped to the east storage tanks and the sump cleaned and decontaminated, also the drain lines will be cleaned and decontaminated. Phase II (Facility modifications - NDMA sources) will include the modification of the waste water collection and storage system to effect a closed system. This task will include the elimination of the open sump, modification to the drain lines, and the elimination of the scrubber waste water open discharge to the drain system.

d. OSHA finding No. 5. All protective clothing will be stored in the clean area of the personnel support facility. Appropriate protective clothing as indicated in Appendix D will be provided and worn prior to entering the regulated area.

e. OSHA finding No. 7. The subject drinking fountain will be disconnected.

f. OSHA findings No. 8 and 9. Appendix D addresses protective clothing levels and decontamination requirements for operational and emergency activities. All personnel wearing modified Level A will be decontaminated prior to removing protective garments and entering the personnel support facility.

g. OSHA finding No. 10. Any employee potentially exposed to NDMA containing liquid, liquid containing an NDMA source or entering the regulated area for types of operations covered by para (c)(5) will be required to shower immediately upon removing protective garments.

h. OSHA findings No. 11 and 21. During routine hydrazine operations, an emergent situation will include any situation where NDMA vapors or liquid contaminated with NDMA exposed to the open air, are present within the facility. During these situations, provisions of 29 CFR 1910.1016 (d)(2) will be implemented consistent with the need to reduce the hazard of spontaneous hydrazine ignition. An SOP describing the emergency procedures to be followed will be established and implemented as part of the overall major revision of operational procedures.

i. OSHA findings No. 16 and 17. Equipment and material within the regulated area known to have come in direct contact with NDMA containing liquid or an NDMA liquid source will be considered contaminated and will be decontaminated prior to leaving the regulated area. Decontamination procedures will be established and implemented.

j. OSHA findings No. 18 and 19. Since the hydrazine facility is an open air installation it does not contain discreet operational areas which can be posted with warning signs specific with regard to protective clothing as required by 29 CFR 1910.1016 para (e)(1)(ii). The level of clothing worn depends on the actions to be performed. If the intent of posting is to remind and warn, the content of the signs must be kept pertinent and non-confusing or else they will be ignored. Therefore, areas known to contain NDMA contaminated liquid will be posted according to (e)(1)(ii) with the

exact requirements to insure that the instructions are specific and non-ambiguous. Areas known to be contaminated with NDMA vapors will be posted similarly except that references to impervious suit will be deleted. The facility already has the appropriate warning signs posted at entry points according to (e)(1)(i). The remaining required instructions, (para (e)(1)(iii)) will be posted as appropriate.

k. OSHA finding No. 20. Each employee working in the hydrazine facility will receive the required training and indoctrination program. A program will be established and implemented to effect this training.

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